

[Submitting Counsel on Signature Page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

4:23-cv-05448-YGR

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK
4:23-cv-05448-YGR

Honorable Yvonne Gonzalez Rogers

**STIPULATED AND [PROPOSED]
ORDER OF DISMISSAL OF CERTAIN
META DEFENDANTS**

Pursuant to Civil L.R. 7-12, Plaintiffs in *People of the State of California, et al. v. Meta Platforms, Inc., et al.* (the “State AGs”) and Defendants Meta Platforms, Inc.; Meta Payments Inc.; and Meta Platforms Technologies, LLC (the “Meta Defendants”) hereby jointly submit this stipulation of dismissal, with prejudice, of the Plaintiffs claims against certain Meta Defendants in *In re Social Media Adolescent Addiction / Personal Injury Products Liability Litigation*, MDL No. 3047 and *People of the State of California, et al. v. Meta Platforms, Inc., et al.* (together, “this Matter”).

The State AGs and Meta Defendants agree and stipulate as follows:

1. Meta Platforms Inc. stipulates that it is the corporate parent of Meta Payments Inc. (*fka* Facebook Payments Inc.) and Meta Platforms Technologies, LLC (*fka* Facebook Technologies, LLC) (together, the “Meta Subsidiaries”).
2. Meta Platforms Inc. agrees not to assert as a defense to liability in this Matter that it is not responsible for any actions or inactions alleged by the State AGs as wrongful on the grounds that such actions or inactions were taken in whole or in part by either or both of the Meta Subsidiaries.
3. Meta Platforms Inc. agrees not to assert as a basis for resisting payment of any monetary judgment or resisting compliance with any court order mandating injunctive or equitable relief that it does not exercise control or ownership over the assets of the Meta Subsidiaries.
4. In consideration of the foregoing, the State AGs’ claims against the Meta Subsidiaries in the Matter shall be, and hereby are, dismissed with prejudice pursuant to Federal Rule of Civil Procedure 41(a), with each party to bear its own costs and attorneys’ fees.

Dated: January 14, 2026

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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

_____, 2025

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